Robert J. Giuffra, Jr. (*pro hac vice*)
giuffrar@sullcrom.com
William B. Monahan (*pro hac vice*)
monahanw@sullcrom.com
Darrell S. Cafasso (*pro hac vice*)
cafassod@sullcrom.com
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Counsel for Defendants FCA US LLC and Fiat Chrysler Automobiles N.V.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CHRYSLER-DODGE-JEEP ECODIESEL MARKETING, SALES PRACTICES AND PRODUCTS LIABILITY LITIGATION THIS DOCUMENT RELATES TO: All Actions	Case No. 3:17-MD-2777-EMC **DEFENDANTS FCA US LLC AND FIAT CHRYSLER AUTOMOBILES N.V.'S RECOMMENDATIONS FOR SPECIAL SETTLEMENT MASTER PURSUANT TO PRETRIAL ORDER NO. 1** Hearing: May 24, 2017 Time: 10:00 a.m. Courtroom: _5 The Honorable Edward M. Chen

In accordance with Paragraph 11 of the Court's Pretrial Order No. 1 (Dkt. No. 6), Defendants FCA US LLC ("FCA US") and Fiat Chrysler Automobiles N.V. ("FCA NV"; collectively with FCA US, "FCA") submit for the Court's consideration as Special Settlement Master the appointment of Kenneth R. Feinberg, Robert S. Mueller, III or Daniel Weinstein.[1]

Kenneth R. Feinberg: Mr. Feinberg has over 40 years of experience resolving some of the nation's most complex, multi-party disputes, including multidistrict litigations ("MDLs"), such as the Agent Orange, Zyprexa and BP/Deepwater Horizon MDLs. Specifically

[1] By submitting these recommendations, FCA does not waive, and expressly preserves, all defenses, including all defenses concerning jurisdiction.

in connection with automotive products liability cases, Mr. Feinberg has served as Special Master of the General Motors' Ignition Switch Compensation Claims Resolution Facility, where he developed and administered the settlement claims protocol. Mr. Feinberg is also serving currently as Special Master of Takata Corporation's compensation fund for Takata's allegedly defective air bag litigation. He has also designed, implemented and administered programs for the distribution of settlement proceeds in other complex matters, including *SEC* v. *American International Group, Inc.*, *United States* v. *Computer Associates International, Inc.*, the September 11 Fund, the Hurricane Katrina Fund, the Sandy Hook Fund, the Virginia Tech Fund and the Boston One Fund. Mr. Feinberg served as an Assistant U.S. Attorney in the Southern District of New York from 1972 to 1975, as Special Counsel for the U.S. Senate Committee on the Judiciary from 1975 to 1978 and as Chief of Staff to Senator Edward M. Kennedy from 1978 to 1980. In 1993, Mr. Feinberg founded The Feinberg Group, LLP, now Feinberg Rozen LLP, which provides mediation, arbitration, strategy development, negotiation and court-sponsored settlement services for complex litigation.

Robert S. Mueller, III: Mr. Mueller served as the Special Settlement Master for the Volkswagen emissions MDL before Judge Breyer. In that matter, he facilitated resolutions involving federal and state governments, including the Department of Justice on behalf of the Environmental Protection Agency and the California Air Resources Board, and hundreds of thousands of class members. The first settlement was announced only four months after counsel for the class filed consolidated complaints, and is considered one of the fastest resolutions, if not the fastest, for any MDL. Mr. Mueller has over 35 years of experience in government service and law enforcement, including as a U.S. Marine Corps officer, as an Assistant U.S. Attorney in three different offices, as the U.S. Attorney for the Northern District of California from 1998 to 2001, as the Assistant Attorney General in charge of the Criminal Division, and as the sixth Director of the FBI under two presidents from September 2001 to 2013. Mr. Mueller's experience also spans the private sector. From 1993 to 1995, he was a partner at Hale and Dorr LLP, and he is currently a partner at WilmerHale in Washington, D.C. He is also an Executive-in-Residence for Georgetown University.

Daniel Weinstein: Judge Weinstein served on the Superior Court of San Francisco from 1982 to 1988, and as Associate Justice Pro Tem, California Supreme Court and the First District Court of Appeal and in Municipal Court of San Francisco. He also was Chief Assistant District Attorney of San Francisco from 1976 to 1978. Prior to 1976, Judge Weinstein was in private practice, specializing in the litigation of federal cases. Since retiring from the bench, he has founded JAMS, the world's largest provider of mediation and arbitration services, and mediated numerous complex antitrust, consumer, environmental, products liability, and securities cases, including involving Adelphia, Apple, Bank of America, BMW, Enron, Microsoft, Motorola, Orange County (California), Parmalat Bank, the State of California, Swiss Converium, UnitedHealth, Vivendi and Volvo. He served as the U.S. Representative to the Bosnian Privatization Commission, overseeing the transfer of $15 billion of state-owned assets to citizens of Bosnia. He has mediated over 3,000 complex disputes and has frequently managed cases involving more than 100 lawyers.

* * *

FCA respectfully recommends that the Court appoint Kenneth Feinberg, Robert Mueller or Daniel Weinstein as Special Settlement Master.

Dated: May 10, 2017 Respectfully submitted,

/s/ Robert J. Giuffra, Jr.
Robert J. Giuffra, Jr.
giuffrar@sullcrom.com
William B. Monahan
monahanw@sullcrom.com
Darrell S. Cafasso
cafassod@sullcrom.com
SULLIVAN & CROMWELL LLP
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New York, New York 10004
Telephone: (212) 558-4000
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